

UNITED STATES DEPARTMENT OF JUSTICE
WASHINGTON, D.C. 20530

RECEIVED
CRIMINAL DIVISION
AUG 26 9 00 AM '73
INTERNAL SECURITY
SECTION
REGISTRATION UNIT

SUPPLEMENTAL STATEMENT

*Pursuant to Section 2 of the Foreign Agents
Registration Act of 1938, as Amended*

JUL 29 1979

For Six Month Period Ending _____
(Insert date)

Name of Registrant

Registration No. 1421

Development Counsellors International Ltd.

Business Address of Registrant

733 Third Avenue - Suite 2100
NYC, N.Y. 10017

I - REGISTRANT

1. Has there been a change in the information previously furnished in connection with the following:

(a) If an individual:

(1) Residence address

Yes ☐

No ☒

(2) Citizenship

Yes ☐

No ☒

(3) Occupation

Yes ☐

No ☒

(b) If an organization:

(1) Name

Yes ☐

No ☒

(2) Ownership or control

Yes ☐

No ☒

(3) Branch offices

Yes ☐

No ☒

2. Explain fully all changes, if any, indicated in Item 1.

Not Applicable

IF THE REGISTRANT IS AN INDIVIDUAL, OMIT RESPONSE TO ITEMS 3, 4, and 5.

3. Have any persons ceased acting as partners, officers, directors or similar officials of the registrant during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

Name

Position

Date Connection
Ended

Not Applicable

4. Have any persons become partners, officers, directors or similar officials during this 6 month reporting period? ☐ Yes ☒ No

If yes, furnish the following information:

Name	Residence Address	Citizenship	Position	Date Assumed
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Not Applicable

5. Has any person named in Item 4 rendered services directly in furtherance of the interests of any foreign principal? ☐ Yes ☒ No

If yes, identify each such person and describe his services.

Not Applicable

6. Have any employees or individuals other than officials, who have filed a short form registration statement, terminated their employment or connection with the registrant during this 6 month reporting period? ☐ Yes ☒ No

If yes, furnish the following information:

Name	Position or connection	Date terminated
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Not Applicable

7. During this 6 month reporting period, have any persons been hired as employees or in any other capacity by the registrant who rendered services to the registrant directly in furtherance of the interests of any foreign principal in other than a clerical or secretarial, or in a related or similar capacity? ☐ Yes ☒ No

If yes, furnish the following information:

Name	Residence Address	Position or connection	Date connection began
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Not Applicable

II - FOREIGN PRINCIPAL

8. Has your connection with any foreign principal ended during this 6 month reporting period?
Yes ☐ No ☒

If yes, furnish the following information:

Name of foreign principal

Date of Termination

Not Applicable

-
9. Have you acquired any new foreign principal¹ during this 6 month reporting period? Yes ☒ No ☐

If yes, furnish following information:

Name and address of foreign principal

Date acquired

French Industrial Development Agency -610 Fifth Avenue
NYC, N.Y. 10020

March 1979

St. Lucia National Development Corp.--220 E. 42 St.-Rm.408
NYC, N.Y. 10017

February 1979

-
10. In addition to those named in Items 8 and 9, if any, list the foreign principals¹ whom you continued to represent during the 6 month reporting period.

Netherlands Antilles Economic Mission

Dept. of Industrial Development/Gov't of Newfoundland & Labrador

Trinidad & Tobago Industrial Development Corp.

III - ACTIVITIES

11. During this 6 month reporting period, have you engaged in any activities for or rendered any services to any foreign principal named in Items 8, 9, and 10 of this statement? Yes ☒ No ☐

If yes, identify each such foreign principal and describe in full detail your activities and services:

Netherlands Antilles--Publicized & informed U.S. businessmen about opportunities in the NA via ads & press releases.

Newfoundland--Publicized Newfoundlands economic growth & development viz press releases.

Trinidad & Tobago--Publicized investment opportunities in T&T via ads in newspapers and magazines.

French IDA--Developed U.S. marketing plan.

St. Lucia--Developed materials for single full page ad in newspaper keynoting their political independence.

¹ The term "foreign principal" includes, in addition to those defined in section 1(b) of the Act, an individual or organization any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign government, foreign political party, foreign organization or foreign individual. (See Rule 100(a)(9)).

A registrant who represents more than one foreign principal is required to list in the statements he files under the Act only those foreign principals for whom he is not entitled to claim exemption under Section 3 of the Act. (See Rule 208.)

12. During this 6 month reporting period, have you on behalf of any foreign principal engaged in political activity² as defined below?

Yes ☐ No ☒

If yes, identify each such foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures or radio and TV broadcasts, give details as to dates, places of delivery, names of speakers and subject matter.

Not Applicable

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13. In addition to the above described activities, if any, have you engaged in activity on your own behalf which benefits any or all of your foreign principals?

Yes ☐ No ☒

If yes, describe fully.

Not Applicable

² The term "political activities" means the dissemination of political propaganda and any other activity which the person engaging therein believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, persuade, or in any other way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policies of the United States or with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

IV - FINANCIAL INFORMATION

14. (a) RECEIPTS - MONIES

During this 6 month reporting period, have you received from any foreign principal named in Items 8, 9 and 10 of this statement, or from any other source, for or in the interests of any such foreign principal, any contributions, income or money either as compensation or otherwise?

Yes ☒ No ☐

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies.³

<i>Date</i>	<i>From Whom</i>	<i>Purpose</i>	<i>Amount</i>
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(See attached listing of Receipts of monies from Foreign Principals)

Total

14. (b) RECEIPTS - THINGS OF VALUE

During this 6 month reporting period, have you received any thing of value⁴ other than money from any foreign principal named in Items 8, 9 and 10 of this statement, or from any other source, for or in the interests of any such foreign principal?

Yes ☐ No ☒

If yes, furnish the following information:

<i>Name of (foreign principal)</i>	<i>Date received</i>	<i>Description of thing of value</i>	<i>Purpose</i>
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Not Applicable

³ A registrant is required to file an Exhibit D if he collects or receives contributions, loans, money, or other things of value for a foreign principal, as part of a fund raising campaign. See Rule 201(e).

⁴ Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

15. (a) DISBURSEMENTS - MONIES

During this 6 month reporting period, have you

(1) disbursed or expended monies in connection with activity on behalf of any foreign principal named in Items 8, 9 and 10 of this statement? Yes ☒ No ☐

(2) transmitted monies to any such foreign principal? Yes ☐ No ☐

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies, including monies transmitted, if any, to each foreign principal.

Date	To Whom	Purpose	Amount
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(See attached listing of Cash Disbursements of monies for Foreign Principals)

Total

15. (b) DISBURSEMENTS - THINGS OF VALUE

During this 6 month reporting period, have you disposed of anything of value⁵ other than money in furtherance of or in connection with activities on behalf of any foreign principal named in items 8, 9 and 10 of this statement?

Yes ☐ No ☒

If yes, furnish the following information:

Date disposed	Name of person to whom given	On behalf of what foreign principal	Description of thing of value	Purpose
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Not Applicable

(c) DISBURSEMENTS - POLITICAL CONTRIBUTIONS

During this 6 month reporting period, have you from your own funds and on your own behalf either directly or through any other person, made any contributions of money or other things of value⁵ in connection with an election to any political office, or in connection with any primary election, convention, or caucus held to select candidates for political office? Yes ☐ No ☒

If yes, furnish the following information:

Date	Amount or thing of value	Name of political organization	Name of candidate
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Not Applicable

V - POLITICAL PROPAGANDA

(Section 1(j) of the Act defines "political propaganda" as including any oral, visual, graphic, written, pictorial, or other communication or expression by any person (1) which is reasonably adapted to, or which the person disseminating the same believes will, or which he intends to, prevail upon, indoctrinate, convert induce, or in any other way influence a recipient or any section of the public within the United States with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party or with reference to the foreign policies of the United States or promote in the United States racial, religious, or social dissensions, or (2) which advocates, advises, instigates, or promotes any racial, social, political, or religious disorder, civil riot, or other conflict involving the use of force or violence in any other American republic or the overthrow of any government or political subdivision of any other American republic by any means involving the use of force or violence.)

16. During this 6 month reporting period, did you prepare, disseminate or cause to be disseminated any political propaganda as defined above? Yes ☒ No ☐

IF YES, RESPOND TO THE REMAINING ITEMS IN THIS SECTION V.

17. Identify each such foreign principal.

Netherlands Antilles	St. Lucia
Newfoundland	
Trinidad & Tobago	

⁵ Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

18. During this 6 month reporting period, has any foreign principal established a budget or allocated a specified sum of money to finance your activities in preparing or disseminating political propaganda?
Yes ☐ No ☒

If yes, identify each such foreign principal, specify amount, and indicate for what period of time.

Not Applicable

19. During this 6 month reporting period, did your activities in preparing, disseminating or causing the dissemination of political propaganda include the use of any of the following:

☐ Radio or TV broadcasts ☒ Magazine or newspaper articles ☐ Motion picture films ☐ Letters or telegrams
☒ Advertising campaigns ☒ Press releases ☐ Pamphlets or other publications ☐ Lectures or speeches
☐ Other (specify) _____

20. During this 6 month reporting period, did you disseminate or cause to be disseminated political propaganda among any of the following groups:

☐ Public Officials ☒ Newspapers ☐ Libraries
☐ Legislators ☒ Editors ☐ Educational institutions
☐ Government agencies ☐ Civic groups or associations ☐ Nationality groups
☐ Other (Specify) _____

21. What language was used in this political propaganda:

☒ English ☐ Other (specify) _____

22. Did you file with the Registration Section, Department of Justice, two copies of each item of political propaganda material disseminated or caused to be disseminated during this 6 month reporting period?

Yes ☒ No ☐

23. Did you label each item of such political propaganda material with the statement required by Section 4(b) of the Act? Yes ☒ No ☐

24. Did you file with the Registration Section, Department of Justice, a Dissemination Report for each item of such political propaganda material as required by Rule 401 under the Act?

Yes ☒ No ☐

VI - EXHIBITS AND ATTACHMENTS

25. EXHIBITS A AND B

- (a) Have you filed for each of the newly acquired foreign principals in Item 9 the following:

Exhibit A⁶ Yes ☐ No ☐

Exhibit B⁷ Yes ☒ No ☐

If no, please attach the required exhibit.

- (a) Have there been any changes in the Exhibits A and B previously filed for any foreign principal whom you represented during this six month period?

Yes ☐ No ☒

If yes, have you filed an amendment to these exhibits? Yes ☐ No ☐

If no, please attach the required amendment.

⁶ The Exhibit A, which is filed on Form OBD-67 (Formerly DJ-306) sets forth the information required to be disclosed concerning each foreign principal.

⁷ The Exhibit B, which is filed on Form OBD-65 (Formerly DJ-304) sets forth the information concerning the agreement or understanding between the registrant and the foreign principal.

26. EXHIBIT C

If you have previously filed an Exhibit C⁸, state whether any changes therein have occurred during this 6-month reporting period.

Yes ☐ No ☒

If yes, have you filed an amendment to the Exhibit C? Yes ☐ No ☐

If no, please attach the required amendment.

Not Applicable

27. SHORT FORM REGISTRATION STATEMENT

Have short form registration statements, been filed by all of the persons named in Items 5 and 7 of the supplemental statement?

Yes ☒ No ☐

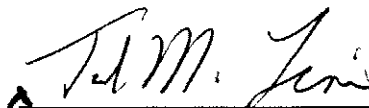
If no, list names of persons who have not filed the required statement.

Not Applicable

The undersigned swear(s) or affirm(s) that he has (they have) read the information set forth in this registration statement and the attached exhibits and that he is (they are) familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of his (their) knowledge and belief, except that the undersigned make(s) no representation as to the truth or accuracy of the information contained in attached Short Form Registration Statement, if any, insofar as such information is not within his (their) his (their) personal knowledge.

(Type or print name under each signature)

(Both copies of this statement shall be signed and sworn to before a notary public or other person authorized to administer oaths by the agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions who are in the United States, if the registrant is an organization.)

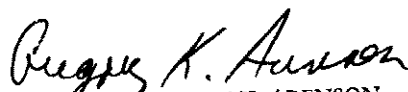


Ted M. Levine - President


Emanuel T. Ellenis-Vice President

Subscribed and sworn to before me at 733 Third Avenue, N.Y.C., N.Y. 10017

this 20th day of August, 19 79



GREGORY K. ARENSEN
Notary Public, State of New York
No. 31-4668717
Qualified in New York County
Commission Expires March 30, 1980

⁸ The Exhibit C, for which no printed form is provided, consists of a true copy of the charter, articles of incorporation, association, constitution, and bylaws of a registrant that is an organization. (A waiver of the requirement to file an Exhibit C may be obtained for good cause shown upon written application to the Assistant Attorney General, Criminal Division, Internal Security Section, Department of Justice, Washington, D.C. 20530.

Client: Netherlands Antilles Economic Mission

Development Counsellors Int'l Ltd.

733 Third Avenue - Suite 2100

NYC, N.Y. 10017 212-687-1383

U.S. Dept. of Justice Report 1/30/79 to 7/29/79

1979				Less Foreign Exchange Loss:	Total Receipts	Total DCI Cash Disbursements
Date	Details:	Fee	Expenses			
2 22	Brochure *		1498367		1498367	
2 28		150000	8235		158235	
3 31		150000	140300		290300	
4 30		150000	7500		157500	
5 31		150000	113508		263508	
6 30		150000	8266		158266	
7 31		150000	8210		158210	
		900000	1764386		2684386	
			TOTAL RECEIPTS-----		2684386	
	* Special Project--This was filed with the Dept. of Justice by the Netherlands Antilles Economic Mission 30 Rockefeller Plaza--NYC, 10020					
	** \$7.66 to be refunded in 8/79 invoice--duplicate payment on York Directions invoice dated 6/26/79					
1978						
11 27	Brod Printing & Litho Co.- Printing, pkg, air freight, shipping & Delivery					9177.94
12 29	" " " " " " " " " "					12191
29	Heishbach & Smith Inc. - Shipping Charges					12191
5 17	Action Photo Photo					2340
18	"					520
7 12	"					350
26	"					700
8 28	"					275
						400
9 15	Film Composer Group - Photo					6400
2 1	Saddle River Studios--Art, Mechanicals, Type					2420.00
7 31	F. Knight Expense					590
1979						
3 29	E.T. Ellenis Expenses					9405
29	T.M. Levine Expenses					1940
5	American Industrial Properties Report -- Space					1099.56
2 1	Associated Messenger - Delivery					800
16	Lloyds Of NY Messenger - Delivery					735
4 11	Area Development Space					54400
23	Associated Messenger - Delivery					400
5 25	Business Journals of America -- Space					3400.1
29	David Blair Co. Inc.- Offset Copies					11660
6 26	York Directions - Offset Copies (**one invoice to be refunded)					** 766 710
26	E.T. Ellenis Expenses					8075
						14186.19
			TOTAL DISBURSEMENTS-----			14186.19

NYC, N.Y. 10017 212-687-1383

Gov't of Newfoundland & Labrador

U.S. Dept. of Justice Report 1/30/79 to 7/29/79

[illegible]

Client: Trinidad Tobago Industrial Development Corp.

733 Third Avenue - Suite 2100

NYC, N.Y. 10017 212-687-1383

U.S. Dept. of Justice Report 1/30/79 to 7/29/79

1979	Details:	Fee	Expenses	Less Foreign Exchange Loss	Total Receipts	Total DCI Cash Disbursements
2 27	January	420000			420000	
3 15	February	420000			420000	
4 20	March	420000	196990		616990	
5 17	April	420000	287874		707874	
6 15	Travel Expenses		8576		8576	
7 3	May	420000	400		420400	
		2100000	493840		2593840	
			TOTAL RECEIPTS-----		2593840	
2 2	M. Brown	Expenses				2325
26	Action Photo	Photo				702
23	E.T. Ellenis	Expenses				2025
3 1	N.Y. Times	Space				383775
1	American Banker	Space				105315
2	Doyle Delta Designs - Storage					3629
5	Penton Industrial Weekly - Space					97879
5	Journal of Commerce - Space					163744
5	Positive Plus	Photo				35090
6	Saddle River Studios - Art, Mechanicals & Type					72500
6	Wall Street Journal - Space					214414
20	AIPR/Indrop Publ. - Space					158270
22	Daily News	Space				448565
29	Positive Plus	Photo				5442
30	TDC	Type				34057
30	T.M. Levine	Expenses				12480
4 25	T.M. Levine	Expenses				3139
6	M. Brown	Expenses				2050
5 3	Pennflor Corp.	Storage				4220
24	President Inc.	Space				246399
25	T.M. Levine	Expenses				13650
6 12	Associated Messenger - Delivery					400
26	Dow Jones & Co. Inc. - Additional charge for Space not paid in error					14580
28	Borgen Publishing - Space					380800
28	Emery Air Freight - Delivery					25765
28	Financial Times of Canada - Space					104341
7 13	Financial Times of Canada - Space					105034
13	The Gazette	Space				61949
23	Action Photo	Photo				1376
23	T.M. Levine	Expenses				16775
23	Pennflor Corp.	Storage				4220
23	Int'l Wood Trade Publ. Inc. - Publication					3150
23	Positive Plus	Photos				31590
23	Halifax Herald Ltd. - Space					40585
23	MacLean Hunter	Space				266154
23	Wood & Wood Products - Publication					500
						3556829

Client: French Industrial Development Agency

733 Third Avenue Suite 2100

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NYC, N.Y. 10017 212-687-1383

U.S. Dept. of Justice Report 1 /30 /79 to, 7 /29 /79

[illegible]

UNITED STATES DEPARTMENT OF JUSTICE
REGISTRATION UNIT
CRIMINAL DIVISION
WASHINGTON, D. C. 20530

RECEIVED
CRIMINAL DIVISION
AUG 23 9 08 AM '79
INTERNAL SECURITY
SECTION
REGISTRATION UNIT

NOTICE

Please answer the following questions and return this sheet in triplicate with your supplemental statement:

1. Is your answer to Item 16 of Section V (Political Propaganda - page 7 of Form OBD-64 - Supplemental Statement):

Yes X or No

(If your answer to question 1 is "yes" do not answer question 2 of this form.)

2. Do you disseminate any material in connection with your registration:

Yes or No

(If your answer to question 2 is "yes" please forward for our review copies of all such material including: films, film catalogs, posters, brochures, press releases, etc. which you have disseminated during the past six months.)

x Ted M. Levine
Signature

8/30/79
Date

Ted M. Levine
Please type or print name of
signatory on the line above

President
Title